

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	No. 19-03055-01-CR-S-MDH
)	
JASON A. HAMANN,)	
)	
Defendant.)	

UNCONTESTED MOTION FOR CONTINUANCE OF TRIAL SETTING

Comes now Defendant, Jason A. Hamann, and hereby moves that this case be continued from its current trial setting on the July 15, 2019, Joint Criminal Docket, and reset to the December 2, 2019, Joint Criminal Docket. In support of this motion for continuance, the Defendant states as follows:

1. A five-count Indictment was filed against Mr. Hamann on May 7, 2019. The Office of the Federal Public Defender was appointed to represent Mr. Hamann on April 19, 2019.
2. Additional time is needed to conduct critical evaluations of the discovery, relevant guidelines, potential motions to suppress, and to otherwise make a global evaluation of the case and options to resolve this matter.
3. This continuance is not sought for the purpose of undue delay, but is sought in truth and fact that the defendant may be afforded due process of law under the Fifth Amendment to the United States Constitution and afforded effective assistance of counsel under the Sixth Amendment to the United States Constitution. In accordance with 18

U.S.C. §§ 3161(h)(7)(A) and (B)(I) and (IV), it is submitted that the above-stated reasons for a continuance outweigh the best interests of the public and the defendant to a speedy trial which is required by 18 U.S.C. § 3161(c)(1). In short, the procedural components that currently exist in this case necessitate a continuance to avoid a miscarriage of justice and/or to insure that Mr. Hamann has clear, meaningful, and effective access to counsel while preparing to resolve this case.

4. Under the provisions of 18 U.S.C. § 3161(h)(7)(A), the period of time until the next criminal trial docket should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial Act.

5. Finally, counsel for the government, Josephine L. Stockard, does not oppose this motion.

WHEREFORE, Defendant, Jason A. Hamann, hereby moves that this case be continued from its current trial setting on the July 15, 2019, Joint Criminal Docket, and be reset on the December 2, 2019, Joint Criminal Docket.

Respectfully submitted,

/s/ Ann M. Koszuth

ANN M. KOSZUTH, #47046

Assistant Federal Public Defender

901 St. Louis Street, Suite 801

Springfield, Missouri 65806

Attorney for Defendant

June 12, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case, and a copy was mailed, via the United States Postal Service, to all non CM/ECF participants.

/s/Ann M. Koszuth

ANN M. KOSZUTH